CASEY D. GISH, Esq. 1 Nevada Bar No. 6657 2 THE LAW OFFICE OF CASEY D. GISH 5940 S. Rainbow Blvd. 3 Las Vegas, NV 89118 Phone: (702) 583-5883 4 Fax: (702) 447-6845 Email: info@gishlawfirm.com 5 Attorney for Plaintiffs 6 UNITED STATES DISTRICT COURT 7 **DISTRICT OF NEVADA** 8 9 AMY VILELA, an individual; Case No.: 2:16-cv-01503 JOZETTE FIGUEREDO, an individual; 10 AMY VILELA, as Special Administrator of the STIPULATION AND PROPOSED ORDER Estate of SHALYNNE RAMOS, TO EXTEND DUE DATE FOR 11 PLAINTIFFS' OPPOSITION TO Plaintiffs. **DEFENDANT TANYA NETZ' MOTION** 12 **TO DISMISS** 13 VS. FIRST REQUEST 14 VALLEY HEALTH SYSTEM, LLC, d/b/a CENTENNIAL HILLS HOSPITAL 15 MEDICAL CENTER, a Delaware Limited 16 Liability Company; UNIVERSAL HEALTH SERVICES, INC., a 17 Delaware corporation; VALLEY HOSPITAL MEDICAL CENTER, INC., a Nevada 18 Corporation; EMCARE, INC., a Deleware 19 Corporation; Tanya Netz PAC; Jill Mcatee, RN; DOE Defendants I through X, inclusive; ROE 20 NURSES I through XX, inclusive; ZOE **HOSPITALS or OTHER MEDICAL** 21 FACILITIES I through X; and ROE CORPORATIONS I through X, inclusive. 22 23 Defendants. 24 Plaintiffs, by and through their attorney of record, Casey D. Gish, Esq. of The Law Office 25 of Casey D. Gish and Defendant, TANYA NETZ, PAC, by and through her attorney of record, 26 Todd Weiss, Esq. of John H. Cotton and Associates, hereby stipulate as follows: 27 28

7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1

2

3

4

5

6

(1)	The due date for Plaintiffs'	Opposition to	Defendant	NETZ's Moti	on to Dis	miss (E	ECI
	12) was October 3 2016						

- (2) The parties agree that the due date for the Opposition should be extended to October 4, 2016.
- (3) Counsel for Plaintiffs moved his office location beginning September 28, 2016. The move continued through October 1, 2016.
- (4) Counsel for Plaintiff has had intermittent computer problems while getting his new office location set-up. These problems resulted in the inability of Plaintiffs' Counsel to file Plaintiffs' Opposition to Defendant NETZ's Motion to Dismiss until 5:37 a.m. on October 4, 2016, which was 5 hours and 37 minutes late.
- (5) Counsel for Defendant NETZ has no objection to the filing being 5 hours and 37 minutes late.

IT IS SO STIPULATED.

Dated this 4th Day of October, 2016	Dated this 4th Day of October, 2016

## Isl Casey D. Gish

CASEY D. GISH, Esq. Nevada Bar No. 6657 THE LAW OFFICE OF CASEY D. GISH

5940 S. Rainbow Blvd. Las Vegas, NV 89118 Phone: (702) 583-5883

Fax: (702) 447-6845 Email: <u>info@gishlawfirm.com</u>

Attorney for Plaintiffs

## Isl Todd Weiss

TODD WEISS, Esq. Nevada Bar No. 14130

JOHN H. COTTON AND ASSOCIATES

7900 West Sahara Ave., #200

Las Vegas, NV 89117 Phone: 702-832-5909 Fax: 702-832-5910

Email: TWeiss@jhcottonlaw.com

Attorneys for Defendant Tanya Netz, PAC

## **ORDER**

Pursuant to the terms of the attached stipulation, the Court orders as follows:

1. Good cause exists for the retroactive extension of the due date for Plaintiffs' Opposition to Defendant NETZ's Motion to Dismiss (ECF 12).

1	
2	
3	
4	
5	
6	
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	

27

28

2.	The due date for the Opposit	on is retroactively extended to October 4, 2016
IT	IS SO ORDERED.	

RICHARD F. BOULWARE, II United States District Judge

DATED: October 10, 2016.